## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

TQ Delta, LLC,

Plaintiff,

v.

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED

CommScope Holding Company, Inc., et al., Defendants.

**DECLARATION OF RAJENDRA A. CHIPLUNKAR** 

- I, Rajendra A. Chiplunkar, state as follows in support of Plaintiff TQ Delta, LLC's Reply Memorandum in Support of its Motions for Summary Judgment Directed to Families 1 and 10:
  - 1. I am a partner at McAndrews, Held & Malloy and counsel of record for TQ Delta, LLC. I am a member in good standing of the State Bar of Illinois. I have personal knowledge of the facts set forth in this Declaration.
  - 2. Exhibit 1 contains an excerpt from a true and correct copy of the deposition transcript of Dr. Gang-San Yu, dated August 24, 2022.
  - 3. Exhibit 2 contains an excerpt from a true and correct copy of the deposition transcript of Dr. Leonard J. Cimini, Jr., dated August 24, 2022.
  - 4. Exhibit 3 contains an excerpt from a true and correct copy of the Opening Expert Report of Todor Cooklev, PhD., dated August 29, 2022.
  - 5. Exhibit 4 contains an excerpt from a true and correct copy of the deposition transcript of Mr. Ben Miller, dated September 20, 2020.
  - 6. Exhibit 5 contains an excerpt from a true and correct copy of the Responsive Expert Report of Dr. Naofal Al-Dhahir Regarding Family 10, dated November 18, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of January 2023, in River Forest, Illinois.

/s/ Rajendra A. Chiplunkar Rajendra A. Chiplunkar